

## **REMARKS**

In the Office Action, claims 4-11, 13, 18-20, 23, 24, 31, 32, 34 and 35 were indicated as allowable if rewritten in independent form to include limitations of the base claim and any intervening claims. Applicants thank the Examiner for indicating the allowability of these claims, and claims 4, 9, 11, 13, 19, 20, 23, 24, 31, 32, 34 and 35 have been placed into independent form with all the limitations of their respective base claims and any intervening claims. Accordingly, those claims, along with their dependent claims, are now in condition for allowance.

Claims 1-3, 12, 14-17, 21, 22, 25-30, 33 and 36 were rejected, claims 4, 9, 11, 13, 16, 17, 19, 20, 23, 24, 27, 31, 32, 34 and 35 have been amended, claims 1-3, 12, 14, 15, 21, 22, 25, 26, 28, 30, 33 and 36 have been canceled without prejudice, and claims 4-11, 13, 16-20, 23, 24, 27, 29, 31, 32, 34 and 35 remain pending in the present application. All claim amendments are fully supported throughout the written description and figures of the specification.

Claims 1-3, 12, 14-17, 21, 22, 25-30, 33, and 36 were rejected under 35 USC 102(e) as anticipated by the Simpson reference, US Patent No.: 6,457,532. This rejection is respectfully traversed, however several of the claims have been canceled or amended to clarify aspects of the invention and to facilitate prosecution of this application to allowance. Specifically, claims 1-3, 12, 14, 15, 21, 22, 25, 26, 28, 30, 33 and 36 have been canceled without prejudice, claims 16 and 17 have been placed into independent form, independent claim 27 has been amended, and claim 29 remains dependent on claim 27.

The Simpson reference discloses a method and apparatus for expanding and conjoining tubular casings in wells. The reference discloses a profiling tool 100 having three rollers 116, each mounted in a bearing 118. The bearings 118 form part of radially slidable pistons 120. (See column 6, lines 32-61 and the various embodiments described throughout the specification).

The Simpson reference, however, does not disclose various features of amended claims 16, 17 and 27. For example, the reference does not disclose a roller comprising "elliptical members having an interior engagement surface" as recited in amended claim 16. The Simpson rollers 902, illustrated in Figure 30 and relied on in the Office Action, are described as having a central portion that is "near-cylindrical" bounded on either side by end portions which are "conical" in shape. (See column 16, lines 28-46). Accordingly, the Simpson reference does not disclose or suggest a roller that comprises elliptical members having an interior engagement surface.

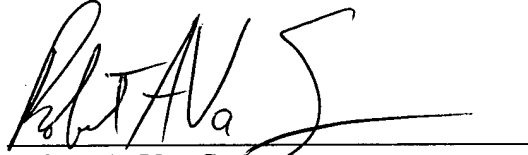
Similarly, the Simpson reference does not disclose or suggest, for example, an expansion portion that comprises "a plurality of expandable discs" as recited in amended claims 17. In the Office Action, Figure 13b is relied on as disclosing disc rollers to create grooves 204. The Simpson reference, however, describes the formation of the grooves in a pipe or casing by a profiling tool that exerts outward forces via rollers as schematically depicted by the force-vector-depicting arrows 204. (See column 8, lines and 49-63). The reference does not describe or suggest "expandable discs" as recited in amended claims 17.

With respect to amended, independent claim 27, the Simpson reference also fails to disclose or suggest certain features of the claim. For example, the reference does not disclose a mandrel having a step profile formed of "adjacent stages" where each stage has a smaller diameter than the preceding stage. Claim 29 depends from independent claim 27 and is patentable for the reasons stated with respect to claim 27 as well as for the unique subject matter recited therein. Accordingly, the remaining claims rejected as anticipated by the Simpson reference, i.e. claims 16, 17, 27 and 29, are believed patentable over the teachings of the reference.

Payment has been enclosed in the amount of \$2200.00 to cover the fees associated with the additional 11 independent claims as set forth above. If this amount is insufficient, please charge deposit account 50-3054 with the amount of the insufficiency.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. A. Van Someren', is written over a horizontal line.

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